

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** §  
§  
**INLAND ENVIRONMENTAL AND** § **CASE NO. 16-34624**  
**REMEDIATION, INC.** § **(Chapter 11)**  
§  
**DEBTOR** §

**DEBTOR'S RESPONSE TO MOTION OF BB&T/CSC LOGIC FOR RELIEF  
FROM THE AUTOMATIC STAY REGARDING NON-EXEMPT PROPERTY**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

Comes now, Inland Environmental and Remediation, Inc. (the "Debtor") and files this Response to the Motion for Relief from the Automatic Stay Regarding Exempt Property (the "Motion") filed by BB&T/CSC Logic (the "Movant"), and in support thereof, would respectfully show this Court as follows:

1. Debtor admits the allegations contained in Paragraph 1 of Movant's Motion.
2. Debtor admits the allegations contained in Paragraph 2 of Movant's Motion.
3. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 3 of Movant's Motion. Therefore, for pleading purposes, those allegations are denied.
4. Debtor admits the allegations contained in Paragraph 4 of Movant's Motion.
5. Debtor admits the allegations contained in Paragraph 5 of Movant's Motion.
6. Debtor admits the allegations contained in Paragraph 6 of Movant's Motion.
7. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 7 of Movant's Motion. Therefore, for pleading purposes, those allegations are denied.

8. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 8 of Movant's Motion. Therefore, for pleading purposes, those allegations are denied.

9. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 9 of Movant's Motion. Therefore, for pleading purposes, those allegations are denied.

10. Debtor denies the allegations contained in Paragraph 10 of Movant's Motion.

11. Debtor denies the allegations contained in Paragraph 11 of Movant's Motion.

12. No allegations of fact are contained in Paragraph 12 of Movant's Motion, therefore, no response is required.

13. No allegations of fact are contained in Paragraph 13 of Movant's Motion, therefore, no response is required.

14. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 14 of Movant's Motion. Therefore, for pleading purposes, those allegations are denied.

15. Debtor denies the allegations contained in Paragraph 15 of Movant's Motion.

16. Debtor denies the allegations contained in Paragraph 16 of Movant's Motion.

17. Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 17 of Movant's Motion. Therefore, for pleading purposes, those allegations are denied.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the Court deny all relief requested in Movant's Motion; and that Debtor be awarded such other and further relief to which

it may be justly entitled.

Dated: December 23, 2016

Respectfully submitted,

FUQUA & ASSOCIATES, PC

BY: /s/ Richard L. Fuqua

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COUNSEL FOR DEBTOR

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with Aaron Gottlieb, Movant's counsel, in a good faith attempt to resolve the dispute which is the subject of Movant's Motion. At this time, settlement is possible, however, a hearing may be required.

/s/ Richard L. Fuqua  
Richard L. Fuqua

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response was forwarded by ECF and/or regular United States mail, postage prepaid, on December 23, 2016 to the parties listed below.

**Movant's Counsel:**

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*/s/ Richard L. Fuqua* \_\_\_\_\_  
Richard L. Fuqua